

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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THE LCF GROUP, INC.,

Plaintiff,

-against-

GRIT GUNS AND AMMO, LLC D/B/A GRIT GUNS  
AND AMMO, AND CATALINA ACCARDI,

Defendants.

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CIVIL ACTION

**NOTICE OF  
REMOVAL**

Index No.:

TO: Clerk of the Court  
United States District Court Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. 1441 and 28 U.S.C. 1446, Defendants Grit Guns and Ammo, LLC d/b/a Grit Guns and Ammo, and Catalina Accardi (collectively “the Defendants”) hereby remove this action from the Supreme Court of the State of New York, County of Nassau, where this action is currently pending, and respectfully states as follows:

1. On or about February 7, 2023, Plaintiff The LCF Group, Inc. commenced this action by filing a Summons and Verified Complaint against the Defendants in the Supreme Court of the State of New York, County of Nassau, under Index No. 602269-23. A true copy of the Summons and Verified Complaint is attached hereto as Exhibit A.

2. On or about March 17, 2023, Plaintiff served the Summons and Verified Complaint on the Defendants by personally delivering a copy to Defendant Catalina Accardi at her residence located at 114 Marsh Side Dr., Savannah, Georgia, 31410.

3. This Court has original jurisdiction of this case pursuant to 28 U.S.C. 1332, and the action is removable to this Court pursuant to 28 U.S.C. 1441 and 28 U.S.C. 1446.

4. Pursuant to 28 U.S.C. 1446, this Notice of Removal is being filed within the 30-day time limit for removal.

5. Plaintiff The LCF Group, Inc. is a corporation organized and existing under the laws of the State of New York and maintains its principal place of business at 3000 Marcus Ave, Suite 2W15, Lake Success, NY 11042. *See* Complaint at ¶1, Exhibit A hereto.

6. Defendant Grit Guns and Ammo, LLC D/B/A Grit Guns and Ammo is a Limited Liability Company organized under the laws of the State of Georgia, with its principal place of business located at 444 Johnny Mercer Blvd Suite C, Savannah, Georgia 31410. *See* Incorporation Documents, attached hereto as Exhibit B.

7. Defendant Catalina Accardi is an individual domiciled in Georgia, residing at 114 Marsh Side Dr., Savannah, Georgia, 31410.

8. Diversity of jurisdiction existed at the commencement of this case and continues to exist on the date of filing of this Notice.

9. Based on the allegations of the Verified Complaint, the amount in controversy in this case is in excess of \$75,000, exclusive of interest and costs. *See* Exhibit A.

10. Venue is proper in this District because this action is currently pending in the Supreme Court of the State of New York, County of Nassau.

11. Pursuant to 28 U.S.C. 1446(d), the Defendants will file a Notice of Filing of Notice of Removal with the Supreme Court of the State of New York, County of Nassau.

Dated: April 13, 2023

LEMERY GREISLER LLC

By:



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Paul A. Levine, Esq.

Attorneys for Defendants

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